



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 F STREET, N.E.  
WASHINGTON, D.C. 20549-4030

DIVISION OF  
ENFORCEMENT

Sarah L. Levine  
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November 14, 2007

**BY FEDEX**

Richard A. Roth, Esq.,  
Jordan Kam, Esq.,  
The Roth Law Firm, PLLC  
545 Fifth Avenue, Suite 960  
New York, New York 10017

Re: Securities and Exchange Commission v. Theodore Roxford et al., Case No. 07 CIV 6146 (PKC)

Dear Mr. Roth and Mr. Kam:

Enclosed is Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6), noticing the 30(b)(6) deposition of Defendant Hollingsworth, Rothwell & Roxford. I have not yet received any production of documents from Defendant Hollingsworth, Rothwell & Roxford (either through direct production or by designating a place and time where the documents would be available for inspection by the Securities and Exchange Commission) and reserve the right to continue the deposition of Defendant Hollingsworth, Rothwell & Roxford should documents be produced in an untimely manner.

Sincerely,

A handwritten signature in black ink, appearing to be "SL" followed by a stylized flourish.

Sarah L. Levine

cc: Theodore Roxford a/k/a Lawrence David Niren (by e-mail)

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

THEODORE ROXFORD  
a/k/a LAWRENCE DAVID NIREN and  
HOLLINGSWORTH, ROTHWELL &  
ROXFORD,

Defendants.

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No. 07-CV-6146

ECF case (PKC)

NOTICE OF DEPOSITION  
PURSUANT TO FED. R. CIV. P. 30(b)(6)

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiff U.S. Securities and Exchange Commission ("SEC") by its undersigned attorney will take the deposition upon oral examination of Defendant Hollingsworth, Rothwell & Roxford ("Defendant HRR") by video and stenographic means before a notary public or some other person or persons authorized to administer oaths, on December 18, 2007, commencing at 10:00 a.m. at the office of the U.S. Securities and Exchange Commission at 3 World Financial Center, New York, New York 10281. You are invited to attend and cross-examine.

In accordance with Federal Rule of Civil Procedure 30(b)(6) Defendant HRR is requested to designate one or more persons to testify concerning:

1. Defendant HRR's formation and operations from the time of its inception through the present, including its purpose, membership, office or physical location, location and extent of physical assets, legal filings, financial assets and record keeping;
2. Defendant HRR's strategy regarding corporate tender offers or takeover offers;

3. Defendant HRR's purchase of stock shares or options or any other financial investments made from the time of its inception through the present including the date of purchase, amount of purchase, means of purchase, date of sale, value at time of sale and means of sale;

4. Defendant HRR's offer to purchase all outstanding shares of Sony Corporation ("Sony") in February 2003 or at any other time from Defendant HRR's inception through the present;

5. Defendant HRR's offer to purchase all outstanding shares of Zapata Corporation ("Zapata") in March 2003 or at any other time from Defendant HRR's inception through the present;

6. Defendant HRR's offers to acquire Edgetech Services, Inc. ("Edgetech") in July and August of 2003 or at any other time from Defendant HRR's inception through the present;

7. Defendant HRR's involvement in an offer by one of the partners of Defendant HRR, Defendant Theodore Roxford also known as Lawrence David Niren ("Defendant Roxford), to take Playboy Enterprises, Inc. ("Playboy") private by purchasing all outstanding shares of Playboy in November 2003 or at any other time from Defendant HRR's inception through the present;

8. Defendant HRR's involvement in an offer by one of the partners of Defendant HRR, Defendant Roxford, to purchase all outstanding shares of PeopleSupport, Inc. ("PeopleSupport") in December 2004 and January 2005 or at any other time from Defendant HRR's inception through the present; and

9. Defendant HRR's source of financial funding for any of the tender offers or takeover offers made by Defendant HRR, from its inception through the present, including but not limited to offers relating to Sony, Zapata, Edgetech, Playboy and PeopleSupport.

/s/ Sarah L. Levine

Sarah L. Levine (MA-651718)(*pro hac*)  
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[levinesa@sec.gov](mailto:levinesa@sec.gov)  
Attorney for Plaintiff

Dated: November 9, 2007

**CERTIFICATE OF SERVICE**

I, Sarah L. Levine, hereby certify that on November 15, <sup>2007</sup>, I caused copies of the foregoing

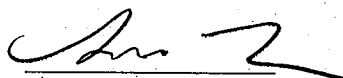
NOTICE OF DEPOSITION to be served on the following:

**BY E-MAIL and U.S. Mail**

Theodore Roxford also known as Lawrence David Niren  
Quo Vila  
Sarmiento 1426, 7th floor, C.P.  
Buenos Aires, 1024, Argentina

**BY U.S. Mail**

Richard A. Roth, Esq.,  
The Roth Law Firm, PLLC  
545 Fifth Avenue, Suite 960  
New York, New York 10017



Sarah L. Levine (MA-651718)(*pro hac*)

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Attorney for Plaintiff